

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF WISCONSIN**

UNITED STATES OF AMERICA,

Plaintiff,

v.

Case No.

TODD DYER,
Reg. No. 05409-089
F.C.I. Elkton
P.O. Box 10
Lisbon, OH 44432

Defendant.

**APPLICATION FOR AN *EX PARTE* TEMPORARY RESTRAINING ORDER AND
MOTION FOR A PROTECTIVE ORDER**

Pursuant to 18 U.S.C. §§ 1514(a)(1), 1514(a)(2), 1514(b)(1), 1514(b)(5), and 18 U.S.C. 3771(d)(1), the United States of America (“United States”), by its undersigned attorneys, moves the Court to issue a temporary restraining order prohibiting Todd Dyer (“Dyer”) from (1) directly or indirectly contacting or attempting to contact any witness or victim in Criminal Case Nos. 15-CR-115 (E.D. Wis.) or 16-CR-100 (E.D. Wis.), including Mark Borst, Bakley Construction, Cindy Bakley, or any immediate family member or representative of Mr. Borst or Ms. Bakley; or (2) directly or indirectly initiating, participating in, or continuing any state or federal lawsuit or appeal against any witness or victim in Criminal Case Nos. 15-CR-115 (E.D. Wis.) and 16-CR-100 (E.D. Wis.), including against Mark Borst, Bakley Construction, Cindy Bakley, or any immediate family member or representative of Mr. Borst or Ms. Bakley, without prior approval from this Court. The United States further requests that the temporary restraining order immediately enjoin further

proceedings in the following lawsuits, which serve no legitimate purpose and which are causing witnesses and victims substantial emotional distress:

1. *Krumdick, et al. v. Borst, et al.*, Case No. 2018CV000804, State of Wisconsin Circuit Court for Walworth County.
2. *Dyer v. Bakley, et al.*, Appellate Case No. 19-0568, Appellate Court of Illinois, Second District.
3. *Dyer, et al. v. Bakley, et al.*, Case No. 19LA000244, Circuit Court of the 22nd Judicial Circuit, McHenry County, Illinois.

The United States requests that such order be issued without written or oral notice to Dyer, based on the facts set out in the Verified Complaint filed herewith. 18 U.S.C. § 1514(a)(2)(A).

The United States further moves the Court to schedule this matter for a hearing at the earliest possible time, so that a protective order containing the same conditions can be entered for a period of three years. 18 U.S.C. §§ 1514(a)(2)(D); 1514(b)(1), 1514(b)(5).

The grounds for this motion are provided in the Verified Complaint and Brief in support of this motion filed herewith.

Dated this 11th day of September, 2019.

MATTHEW D. KRUEGER
United States Attorney

By: /s/ Emily A. Constantine

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